

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
TRENTON VICINAGE**

ATLAS DATA PRIVACY CORP., JANE
DOE-1, JANE DOE-2, EDWIN
MALDONADO, SCOTT MALONEY,
JUSTYNA MALONEY, PATRICK
COLLIGAN, and WILLIAM SULLIVAN

Plaintiffs,

v.

MYHERITAGE LTD., MYHERITAGE
(USA), INC., RICHARD ROES 1-10,
fictitious names of unknown individuals, and
ABC COMPANIES 1-10, *fictitious names of
unknown entities*,

Defendant.

Civil Action No.: 3:24-cv-04392

**MOTION FOR ADMISSION
PRO HAC VICE**

PLEASE TAKE NOTICE that on May 6, 2024, or as soon thereafter as counsel may be heard, Defendants MyHeritage Ltd. and MyHeritage (USA), Inc., by and through its attorneys, McElroy, Deutsch, Mulvaney & Carpenter, LLP, shall move for an entry of an order pursuant to Local Civil Rule 101.1(c), admitting Jacquelyn E. Fradette, Esq. *pro hac vice*.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendants will rely upon the Declaration of Nicholas K. Lagemann, Esq. (Exhibit 1) and the Declaration of Jacquelyn E. Fradette, Esq. (Exhibit 2). A proposed form of Order (Exhibit 3) is submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is not requested unless this Motion is contested.

Dated: April 1, 2024

McELROY, DEUTSCH, MULVANEY &
CARPENTER, LLP

/s/ Nicholas K. Lagemann

Nicholas K. Lagemann

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 1, 2024, a true and correct copy of the foregoing Application for Admission Pro Hac Vice for Jacquelyn E. Fradette, Esq., was served on the following counsel of record electronically by transmission to an electronic filing service provider for service through the state's electronic filing manager:

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By: /s/ Nicholas K. Lagemann
Nicholas K. Lagemann